

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

JONATHAN MARCUM,

Plaintiff,

v.

Civil Action No: 3:12cv108

DOLGENCORP, INC. d/b/a DOLLAR GENERAL,

Defendant.

JOINT MOTION FOR A PROTECTIVE ORDER

Defendant Dolgencorp, LLC (incorrectly identified as Dolgencorp, Inc. in the Complaint and hereafter referred to as “Defendant”), by counsel, and Plaintiff Jonathan Marcum (“Plaintiff”), by counsel, (collectively the “Parties”) pursuant to Fed. R. Civ. P. 26(c) and Local Civil Rule 5 of the Eastern District of Virginia, jointly move this Court for entry of a protective order. In support of this Motion, the parties state as follows:

1. The parties expect that this case will entail the production of voluminous documents and information.
2. The parties agree that it is likely that confidential or proprietary information, or information that constitutes trade secrets, will be produced as part of the discovery, and that the production and dissemination of such information could be harmful absent appropriate protection.

The Parties agree that good cause exists for entry of the Stipulated Protective Order, a copy of which is being circulated for endorsement and is attached hereto. (See Ex. 1). Based on

the agreement of the parties and for good cause to protect confidential information and facilitate discovery, the Parties respectfully request that the Court enter the Stipulated Protective Order.

WE ASK FOR THIS:

**DOLGENCORP, LLC (incorrectly
identified as Dolgencorp, Inc. in the
Complaint)**

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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of August, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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